

1 MICHAEL N. TURNAGE YOUNG*
2 DANIEL HARAWA
3 NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
4 700 14th Street NW, Suite 600
Washington, DC 20005
5 Tel: (202) 682-1300
Fax: (202) 682-1312
6 MTURNAGEYOUNG@NAACPLDF.ORG
**Counsel of record, CA Bar No. 247796*

7 SHERRILYN A. IFILL
PRESIDENT & DIRECTOR-COUNSEL
8 JANAI S. NELSON
SAMUEL SPITAL
9 NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
10 40 Rector Street, 5th Floor
New York, NY 10006
11 Tel: (212) 965-2200
Fax: (212) 226-7592

12 *Counsel for Amicus Curiae NAACP Legal Defense and Educational Fund, Inc.*

13
14 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO-OAKLAND DIVISION

16 SIERRA CLUB and SOUTHERN BORDER
17 COMMUNITIES COALITION,

18 *Plaintiffs,*

19 *v.*

20 DONALD J. TRUMP, President of the United
States, in his official capacity; PATRICK M.
21 SHANAHAN, Acting Secretary of Defense, in
his official capacity; KIRSTJEN M. NIELSEN,
Secretary of Homeland Security, in her official
capacity; and STEVEN MNUCHIN, Secretary
22 of the Treasury, in his official capacity,

23 *Defendants.*

24 Case No.: 4:19-cv-00892-HSG

P.I. Hearing Date: May 17, 2019
Time: 10:00 AM

**MOTION FOR LEAVE TO FILE
AMICUS BRIEF IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

The NAACP Legal Defense and Educational Fund, Inc. (“LDF”) moves for leave to file the attached amicus brief in support of the *Sierra Club* Plaintiffs’ motion for a preliminary injunction. This case raises issues of national importance concerning the rule of law in our constitutional democracy. LDF respectfully submits that its long history of relying on the rule of law to challenge discrimination and advance civil rights gives it a unique perspective that will assist the Court in considering these issues. LDF is filing this brief consistent with the timing and page limitations set forth in this Court’s scheduling order, *see* Doc. No. 43, and the Government has consented to this filing.

For the foregoing reasons, LDF respectfully requests that this Court grant its motion for leave to file an amicus brief.

Dated: May 2, 2019

Respectfully Submitted,

s/ Michael N. Turnage Young

Michael Turnage Young
Counsel of record
Daniel S. Harawa
NAACP Legal Defense and
Educational Fund, Inc.
700 14th St. NW, Suite 600
Washington, DC 20005
Tel: (202) 682-1300
mturnageyoung@naacpldf.org

Sherrilyn A. Ifill
President & Director-Counsel
Janai S. Nelson
Samuel Spital
NAACP Legal Defense and
Educational Fund, Inc.
40 Rector St. 5th Floor
New York, NY 10006
Tel: (212) 965-2200